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Attorneys for Counter-Defendants
DISNEY ENTERPRISES, INC., THE WALT
DISNEY COMPANY, AND WALT DISNEY
PRODUCTIONS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CLARE MILNE, an individual, by
and through MICHAEL JOSEPH
COYNE, her RECEIVER, and
DISNEY ENTERPRISES, INC.

Plaintiffs,

v.

STEPHEN SLESINGER, INC.,

Defendant.

STEPHEN SLESINGER, INC.,

Counter-Claimant,

v.

DISNEY ENTERPRISES, INC.;
THE WALT DISNEY COMPANY;
and WALT DISNEY
PRODUCTIONS,

Counter-Defendants.

Case No. CV-02-08508 FMC (PLAx)

**DECLARATION OF CASSANDRA
SETO IN SUPPORT OF DISNEY'S
MOTION FOR SUMMARY
JUDGMENT ON SSI'S
COUNTERCLAIMS, OR IN THE
ALTERNATIVE, FOR SUMMARY
ADJUDICATION**

The Hon. Florence-Marie Cooper

Date: August 24, 2009
Time: 10:00 a.m.
Place: Courtroom 750

DECLARATION OF CASSANDRA SETO

I, Cassandra Seto, declare and state:

1. I am an associate at O'Melveny & Myers LLP, counsel of record for Counter-Defendants Disney Enterprises, Inc., The Walt Disney Company, and Walt Disney Productions (collectively, "Disney") in the above-entitled action. I have personal knowledge of the matters set forth in this declaration, and if called to testify to the facts stated herein, I could and would do so competently.

2. Attached hereto as Exhibit A is a chart comparing the grant language in the 1961 and 1983 agreements between Disney and Counter-Claimant Stephen Slesinger, Inc. ("SSI").

3. Attached hereto as Exhibit B is a true and correct copy of SSI's Petition for Cancellation, dated November 30, 2006, which was filed in the United States Patent and Trademark Office.

4. In 2004, Disney and/or its affiliates registered at least 45 copyrights and renewed at least 14 copyrights in the United States Copyright Office relating to the Winnie the Pooh works ("Pooh Works"). Attached hereto as Exhibit C are true and correct copies of those copyright registration certificates. Attached hereto as Exhibit D are true and correct copies of those copyright renewal certificates.

5. In 2004, Disney filed at least seven actions for copyright and trademark infringement relating to the Pooh Works in the United States District Court for the Central District of California. In 2004 and 2005, judgment was entered in those actions. Attached hereto as Exhibit E are true and correct copies of those judgments.

6. Attached hereto as Exhibit F is a true and correct copy of relevant excerpts from SSI's Third Supplemental Responses to Disney's Tenth Set of Special Interrogatories, dated May 16, 2002, which was filed in the state court

1 action between Disney and SSI in Los Angeles Superior Court (Case No. BC
2 022365).

3 I declare under penalty of perjury under the laws of the United States that the
4 foregoing is true and correct and that this declaration is executed this 6th day of July
5 2009 at Los Angeles, California.

6 
7 Cassandra Seto